



KANOKLA

Keeping You Connected

100 KanOkla Avenue
Caldwell, KS 67022

Phone 620-845-5682 | Fax 620-845-5636 | www.kanokla.com

Received & Inspected

FEB 23 2010

FCC Mail Room

February 10, 2010

Via FCC ECFS System
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Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S. W.
Washington, D.C. 20554

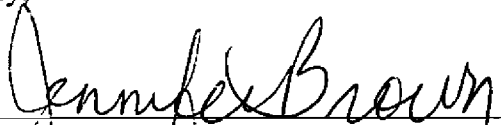
RE: FCC Docket EB 06-36
EB-06-TC-060
KanOkla Telephone Association, Inc.

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached **KanOkla Telephone Association** annual compliance certificate for the most recent period as required by section 64.2009(e) of the Commission's Rules together with a statement of the Company's operating procedures, a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI) (Attachment B).

Should you have any questions regarding this filing, please direct them to the undersigned at number (620) 845-5682 or email jbrown@kanokla.com.

Sincerely,

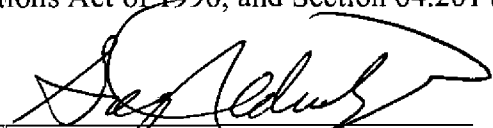

Jennifer Brown, Billing Representative
100 KanOkla Ave, Caldwell, KS 67022

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List ABCDE

**ANNUAL OFFICER'S CERTIFICATION LETTER of
Customer Proprietary Network Information (CPNI)
Procedures Compliance of KanOkla Telephone Association**

I, Greg Aldridge, hereby certify for calendar year 2009, that I have personal knowledge that KanOkla Telephone Association has established operating procedures that are adequate to ensure compliance for the forthcoming year regarding the Customer Proprietary Network Information (CPNI) generated by the customers of KanOkla Telephone Association, Inc. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, and Section 64.201 *et. seq* of the FCC rules.

Signed: _____


Greg Aldridge, CEO
100 KanOkla Ave, Caldwell, KS 67022

Dated: _____

2-10-10
February 10, 2010



Attachment A

Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of **KanOkla Telephone Association** ensure that the company complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of CPNI.

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisory/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns, via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI, that include a copy of notice and the customers 'opt-out' written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.



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**ATTACHMENT B
Customer Complaint Log**

100 KanOkla Avenue
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<u>Date of Occurrence</u>	<u>Category</u>	<u>Action Taken</u>	<u>Supervisor's Signature & Date</u>
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For the Fiscal Year 2009 KanOkla Telephone Association has had no customer complaints.